

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of:)

Policies and Rules Implementing)
the Telephone Disclosure and)
Dispute Resolution Act)

PETITION TO INITIATE RULEMAKING TO ADOPT ADDITIONAL SAFEGUARDS
BY THE FLORIDA PUBLIC SERVICE COMMISSION

The Florida Public Service Commission (FPSC) files this Petition to Initiate Rulemaking on an expedited basis to adopt additional safeguards in response to complaints received by this agency from local exchange telephone company subscribers. Our review of these complaints suggests that abuse of and evasion of applicable rules and requirements by segments of the Pay-Per-Call (PPC) industry warrant immediate additional corrective action.

While the Federal Communications Commission (FCC) and the Federal Trade Commission (FTC) have recently taken action to address PPC abuses, the FPSC has received over 800 complaints and inquiries about the pay per call industry this year from Florida telephone subscribers. Complaints have continued despite efforts to clarify applicable federal requirements contained in the Code of Federal Regulations, Part 64.1501, Subpart O - Interstate Pay-Per-Call and 800 services.

Apparent abuses and violations of Subpart O include (1) billing of PPC charges as regulated telecommunications service (examples, pages A1-2, A22-25, A31, A34-35, A45-46, A63, A66, A70-

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71); (2) billing PPC charges to consumers who deny all knowledge of the calls (examples, pages A1-2, A10-11, A22-25, A37-39, A48-51, A53-54, A58-66); (3) billing PPC charges for adult entertainment provided to children (examples, pages A33, A36); (4) unauthorized billing of PPC charges (examples, pages A36, A44, A48-51, A55-62, A64); (5) billing charges which are not accurately described on the bill (examples, pages A2, A24-25, A29-31, A34-35, A63); (6) disconnecting service for failing to pay unregulated PPC charges (example, page A67); and (7) billing for voicemail and conference calls of which the subscriber has no knowledge (examples, pages A29-31, A53-54, A58-63).

Because these complaints have continued despite efforts by the FCC and FTC to address the evasion and abuse of applicable federal requirements, we believe additional safeguards are necessary to protect consumers. Moreover, consumers are demanding action (examples, pages A36-39, A48-51).

SECURITY OF LOCAL EXCHANGE COMPANY (LEC) BILLING SYSTEMS BREACHED

Currently, even without the permission of subscribers, virtually anyone may submit charges through clearinghouses and service bureaus to be billed by local exchange companies (LECs). This policy of easy access to LEC billing by IXC's and information providers (IPs) was originally conceived in part to enhance development of interexchange competition. However, because of the

ease with which charges can be billed to subscribers, the system facilitates subscribers being billed and pressured to pay charges for services they have not received. Once such charges appear on local telephone bills local subscribers have an extremely difficult time in obtaining assistance. Frequently the entity responsible for the charges is inaccessible by phone or through correspondence. Moreover, LECs, as middlemen in the billing and collecting of such charges, are often unable or unwilling to enforce their contracts with apparently unscrupulous PPC providers, service bureaus or clearinghouses (letters from Southern Bell, GTE Florida and Sprint United/Centel, pages A3-21, A26-32, A40-43).

Information providers frequently state that consumers dial the 1-800 number of the IP or its Service Bureau (SB) to access information. The caller's telephone number through the telephone network's automatic number identification (ANI) function is claimed to have been delivered with the call or upon a subsequent billing. Through a series of prompts the IP or SB assigns a four-digit PIN to the ANI. The caller is then "connected" to the IP to receive information or join a conference call or receive some alleged service at tariffed rates presumably on file at the FCC (examples, pages A52, A68-69). In some cases, IPs or SBs assert that callers are connected to an IXC after dialing an 800 number. Callers are then said to be connected to 900 numbers, bypassing LEC screening; or, the caller is said to have made a direct dialed call by

accessing a middleman for completion of a call to Canada, the Caribbean or some international destination, thus bypassing international blocking (examples, pages A52, A68-71).

Bills are then flowed through the LEC billing system in Electronic Message Interface (EMI) format to appear on LEC subscribers' telephone bills (examples, pages A2, A24-25, A34-35, A45-46, A66, A68-71). In such cases, the PIN assigned by the IP or SB is ignored in the billing process because in the EMI format the PIN fields are not necessary to identify the account to be billed.

Thus, using the LECs' billing systems, interexchange carriers (IXCs), information providers (IPs), service bureaus, clearinghouses or anyone with an agreement with a LEC, IXC, IP, SB or clearinghouse can currently charge any local exchange subscriber any amount for virtually any service, and in some cases for no service, simply by using ten digits of a telephone number. Providers often claim to have been authorized by the subscriber to do so, despite denials from subscribers (examples, pages A53-54, A58-61, A64).

The controls subscribers normally have to avoid such charges can be evaded by providers. For example, hotels, motels, businesses and parents often block access to 900 type services. However, the use of a toll free number allows the bypass of such a control and frequently results in unauthorized charges appearing on bills (examples, pages A22-23, A33, A36, A40-43, A48-51) In fact,

IP ads frequently utilize a "toll free number" to encourage use of its service. Further, subscribers are informed that they must contact each IP and put their number on its list of subscribers that will not accept charges; otherwise, they may be charged again. (examples, pages A33, A37-38, A47-52, A68-69)

Telephone subscribers do not, as they would with a credit card company, have the option to discontinue their relationship with their local telephone company if they wish to continue having local telephone service. Thus, the security of the LEC billing system is even more important to subscribers than other billing systems. Therefore, it is in the public interest for the FCC to take an active role in this process and to fully address abuses intended to have been corrected by the Telephone Disclosure and Dispute Resolution Act (TDDRA).

PROPOSED SAFEGUARDS

The Florida Public Service Commission strongly supports establishing a service that would allow subscribers to block billing to their phone numbers of calls or services for which the interexchange carrier or information provider does not obtain and provide to the LEC an appropriate proprietary card number. The FCC should require all LECs to offer the service to subscribers to local telephone service.

Under such an arrangement, no provider (except of course the subscriber's local and interexchange carriers, accessed via direct dialing, including 10XXXX-1) could place any charge on a specific customer's local exchange company bill unless it obtained the customer's LEC proprietary card number. LECs could amend their billing contracts to ensure that IPs and other providers are notified to obtain the valid LEC number before providing services. As a result, there should be less inquiry to LEC business offices, less confusion to the public and fewer billing adjustments by the PPC industry.

As precedent, in Docket Number 91-115, the FCC recognized the reasonableness of AT&T's proprietary card. Indeed, AT&T successfully marketed its proprietary card as protecting consumers from unwanted higher cost services. Therefore, the FCC should now explore making available a proprietary card option to LEC subscribers to have all charges to their local service bill restricted unless the calls are legitimately direct dialed (not via a 1-800 number as described by some carriers - example, pages A24-25, A34-35, A70-71) or their LEC card number with valid LEC PIN is used. The LEC proprietary card block service should significantly reduce the type of abuse related to 1-800 (888) access. However, to ensure that a LEC proprietary card screening service will be a viable solution to PPC abuses, the FCC must also adopt a strict definition of direct dialed calls, to prevent IPs from billing as

direct dialed those calls which actually originate as 1-800(888) calls.

Implementation of a proprietary card billing block option should not cause excessive disruption to the current system of billing for information services. Callers would continue to dial the access code or number specified by the IP. Upon connection, the caller should be required to provide or input his/her calling card number, just as with any operator assisted call. The IP would have the option, as any operator service provider does, to validate the number. The IP would then submit an EMI record, as they do today, except that instead of the EMI record fields containing only the telephone number, the fields would be expanded to add the 4-digit LEC calling card PIN. With the correct PIN, the LEC would automatically bill the charges. Without the correct PIN on inbound EMI records, the LEC would automatically reject the charges, for subscribers that subscribe to its billing block option.

This should be a simple and straightforward way to ensure that consumers have control over the charges that appear on their LEC bills. Since only authorized services should be billed in any case, there should be no hardship imposed upon the information industry to implement this requirement. LECs may need to make software changes to their billing systems to expand the fields in EMI message records to allow for recording and including the PIN with all future EMI records. To the extent that there are costs

associated with implementation, those costs may be offset by savings achieved from reductions in the level of inquiry to business offices concerning PPC charges, reductions in credits for unauthorized charges, reduced regulatory costs associated with complaint investigation and follow-up and other savings that may result.

With respect to IP charges to IXC cards and credit cards such as MasterCard and Visa, the system may continue to operate as it does today with no change. Legitimate providers can also continue to provide their services through 900 type tariffs or obtain the LEC card number or other credit card number for authorized charges for services accessed via an 800 (888) or any other number. Moreover, the competitive industry also has the option to obtain its customers' names and addresses from LECs for direct billing under existing tariffs. Thus industry comments as to the potential harm to the industry from implementing a billing block option should be weighed carefully against the potential for fraud and abuse through use of the LECs' billing systems.

If a proprietary card block option is not feasible, the FCC should consider improving the security of the LECs' billing systems through some form of oversight, perhaps in the form of registration of all parties that use the LEC billing system. When published, the list may be used by state and federal officials to seek

remedial action directly from IPs, SBs and clearinghouses when applicable pay-per-call requirements appear to be ignored.

An additional option the FCC could consider is requiring a clause in LEC billing contracts for termination of such agreements upon sufficient showing of continuing abuse of applicable federal and/ or state requirements.

At a minimum, the FCC should address this form of abuse by PPC providers through review of tariffs on file at the FCC. It appears that not all tariffs on file reflect reasonable rates, particularly where conference calling or international direct dial rates are substituted for pay-per-call charges. IPs are able to hide behind the FCC's jurisdiction when states receive complaints about these charges from consumers.

CONCLUSION

Because the consumer protections implemented thus far in response to the Telephone Disclosure and Dispute Resolution Act have not been effective, the Florida Public Service Commission urges the FCC to implement a LEC proprietary card block option. If a LEC proprietary card blocking option is not feasible, other alternatives include establishing some form of oversight of billing practices in view of billing abuses as described herein; and requiring a clause in LEC billing contracts to address termination

of such agreements upon sufficient showing of continuing abuse of applicable federal or state requirements.

The FCC should also review tariffs on file to ensure such tariffs are not relied upon by the PPC industry to mask charges and coerce subscribers to pay unauthorized charges upon threat of disconnection of their local telephone service.

Respectfully submitted,



CYNTHIA B. MILLER
Associate General Counsel

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
(904) 413-6082

DATED: December 6, 1995

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, Fl.
32399-0850

August 10, 1995

Attn. Mr. Kenya Thompkins

Dear Mr. Tompkins:

Enclosed are copies of my phone bills dated June 25th July 25.

I called I T A when I recieved the June bill. I explained to them I did not make the call and it was not placed from my phone as I live alone and when I leave the house it is locked.

I later checked my callender and found that I was in the doctors office at the time the call was logged. My house was locked and there was no sign of forced entry when I returned.

The man I talked to the first time said he would note that I refused to pay for the call.

When I recieved the July bill I saw that I was still billed for the call. It took two days of calling to finally get through to them. The lady who answered my call could give no satisfaction so I asked to her supervisor. She said she would transfer the call. The phone rang and rang then went dead. The connection had been broken. That is when I contacted your office.

I want to thank you for the courteous attention you gave to my problem. I hope this information is what you want and will be helpful in resolving this problem.

Please excuse the typing, it's better than my hand writing.

Thank you again,

Harvey J. Sutton
Harvey J. Sutton
655 Beverly Drive
Lake Wales, Fl. 33853

Phone: 941-676-6734

REF: TELEPHONE CONVERSATION 8-9-95

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62000000
6111

PAGE 9 OF 10

TELEPHONE NUMBER 941 676-6734 Customer ID 661120
BILL DATE June 25, 1995

For billing
questions call
1 800 866-8889

LONG DISTANCE CALLS (continued)

Billing for ITA



ITA Regulated Service

Regulated Calls

Direct Dialed Calls

Date	Time	Place called	Number called	Period	Min.	Amount
1 May 23	3:47 pm	Toronto	416 754-5198	Day	5	\$ 20.29
Total						\$ 20.29

Taxes and Fees on ITA Regulated Services

	Amount
2 Federal excise tax (3.00% of \$20.76)	\$.62
3 Florida interstate gross receipts tax (2.30% of \$20.29)	.47
Total	\$ 1.09

ITA regulated service charges

\$ 21.38

Total long distance/ITA

\$ 21.38

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8-9
9:00

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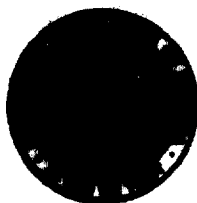
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941 676-6734 19661120 10 06

- A2 -

Commissioners:

**SUSAN F. CLARK, CHAIRMAN
J. TERRY DEASON
JULIA L. JOHNSON
DIANE K. KIESLING
JOE GARCIA**



**DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER
DIRECTOR
(904) 488-1280**

Public Service Commission

March 20, 1995

**GTE Florida Incorporated
Ms. Beverly Y. Menard
% Mr. Richard M. Fletcher
106 East College Avenue, Suite 1440
Tallahassee, Florida 32301-7704**

Dear Ms. Menard:

The purpose of this letter is to express my concern at the number of pay-per-call complaints from GTE subscribers received by the Commission. In reviewing the files it seems that it is appropriate for GTE to act to address repetitive abuses from the same IP, service bureau or clearinghouse. Accordingly, please review the attached files and respond with the requested information by April 4, 1995.

Attachment I is a portion of GTE's billing of the Sheraton Sand Key Resort. Included are bills from ITA & Integretel. For ITA the number actually dialed by the hotel guest is 1-800-218-3000 and for Integretel, 1-800-816-7399. However, both bills indicate they are for direct dialed international toll calls. Of course, had they been direct dialed, as indicated by ITA & Integretel, the Sheraton's switch would have billed the charges to the guests' rooms. Since the guest actually dialed an 1-800 number instead, the hotel assessed no charges to its guests for the call and is not now able to collect. Attachment II contains examples of similar bills for GTE's residential subscribers. Attachment III includes example bills from ITA reporting charges to be for telegram(s), in lieu of pay per call charges.

- (1) With respect to these charges, please state whether GTE agrees that calls originating via a 1-800 number to a subsequent number can be classified as direct dialed to the second number or be billed as a telegram as done by ITA and Integretel.
- (2) Does GTE agree that charges for calls completed to information providers, whether offshore or domestic, may be considered to be regulated direct dialed calls or non-regulated telegrams instead of pay-per-call services?

GTE Florida
Ms. Beverly Menard
March 20, 1995
Page 2

(3) If not, please state whether such apparent misrepresentation is prohibited by your agreement with ITA and IntegreTel. If it is not prohibited, why shouldn't it be?

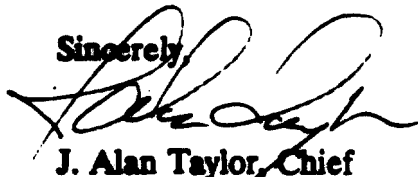
(4) Please also indicate whether and what action GTE will take to protect its customers from such misrepresentation on GTE bills in the future and why these bills should not be adjusted.

(5) If no action is contemplated, please explain why.

(6) If no action is contemplated by GTE to protect its subscribers from such apparent billing abuses in the future, what action should the Florida Public Service Commission take to address these issues?

Meanwhile, please feel free to contact me if you have any questions.

Sincerely,



J. Alan Taylor, Chief
Bureau of Service Evaluation

Attachments

cc: Kathy Lewis
Monica Barone

Kathy



**GTE Florida
Incorporated**

One Tampa City Center
Post Office Box 110
Tampa, Florida 33601-0110

April 3, 1995



**Mr. J. Alan Taylor, Chief
Bureau of Service Evaluation
Division of Communications
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850**

Dear Mr. Taylor:

**Subject: DATA REQUEST DATED MARCH 20, 1995 CONCERNING THE
NUMBER OF PAY-PER-CALL COMPLAINTS FROM GTE SUBSCRIBERS**

**Attached is GTE Florida's response to your letter dated March 20, 1995
concerning the number of pay-per-call complaints from GTE subscribers that are
received by the Commission.**

**If you have any questions or require additional information, please contact Debby
Kampert at 813/224-6505.**

Sincerely,

Debby Kampert
Beverly Y. Menard

**Beverly Y. Menard
Regional Director - Regulatory & Industry Affairs**

**BYM:DBK:wjh
Attachment**

**GTE FLORIDA'S RESPONSES TO DATA REQUEST DATED MARCH 20, 1995
CONCERNING THE NUMBER OF PAY-PER-CALL COMPLAINTS**

- 1) With respect to these charges, please state whether GTE agrees that calls originating via 1-800 number to a subsequent number can be classified as direct dialed to the second number or be billed as a telegram as done by ITA and Integretel.

Response:

GTE does not agree that calls originated via 1-800 numbers should be classified as direct dialed, or billed as telegrams. GTE does not knowingly bill and collect for pay-per-call (PPC) services accessed via 800 numbers.

- 2) Does GTE agree that charges for calls completed to information providers, whether offshore or domestic, may be considered to be regulated direct dialed calls or non-regulated telegrams instead of pay-per-call services?

Response:

No, GTE does not agree that charges for calls completed to information providers should be classified as direct dialed or telegrams. Charges for calls completed to information providers should be classified as pay-per-call.

- 3) If not, please state whether such apparent misrepresentation is prohibited by your agreement with ITA and Integretel. If it is not prohibited, why shouldn't it be?


Response:

This type of misrepresentation is prohibited by GTE's billing and collection agreement with ITA and Integretel. However, GTE cannot identify 800 pay-per-call messages disguised as direct dialed calls or telegrams, unless the customer calls in to question the bill.

- 4) Please also indicate whether and what action GTE will take to protect its customers from such misrepresentation on GTE bills in the future and why these bills should not be adjusted.

**GTE Responses to March 20, 1995 Data Request
Concerning the number of Pay-Per-Call Complaints
Page 2**

Response:

Under the terms of GTE's Billing and Collection agreements with Integretel and ITA, the carriers (ITA and Integretel) perform their own inquiry services. Therefore, if a customer contacts GTE with questions regarding charges from either of these carriers, GTE must first refer the customer to the carrier. No mention of the customer's initial contact with GTE will be made on the customer's account records. If the long distance carrier fails to satisfy the customer's complaint, or if the customer refuses to contact the carrier, GTE will remove the charge from the customer's account. GTE is actively pursuing the question of whether Integretel and ITA are in violation of their billing and collection agreements. 

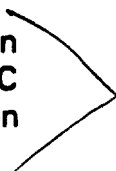
- 5) If no action is contemplated, please explain why.

Response:

N/A.

- 6) If no action is contemplated by GTE to protect its subscribers from such apparent billing abuses in the future, what action should the Florida Public Service Commission take to address these issues?

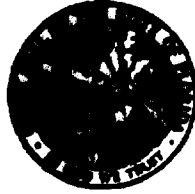
Response:

GTE is actively pursuing the question of whether Integretel and ITA are in violation of their billing and collection agreements. To assist GTE, the FPSC should continue to bring complaints of billing abuses to our attention as soon as they are filed. 

State of Florida

Commissioners:

SUSAN F. CLARK, CHAIRMAN
J. TERRY DEASON
JULIA L. JOHNSON
DIANE K. KIESLING
JOE GARCIA



DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER
DIRECTOR
(904) 413-6600

Public Service Commission

July 12, 1995

Ms. Nancy H. Sims
Director of Regulatory Relations
Southern Bell Telephone & Telegraph Company
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

Dear Ms. Sims:

Enclosed is correspondence from a customer of Southern Bell concerning charges included on a recent bill. In view of this customer's experience and other complaints from SBT subscribers about ITA, pursuant to Chapter 364.27, Florida Statutes, please look into this matter and respond to the following questions by July 31, 1995.

1. Describe the services provided by SBT to ITA and provide a reference whether from interstate or intrastate tariffs.
2. Can SBT from SMDR or other records verify that the toll or 800 number calls in question were or were not made or received by the subscriber's number? If so, does SBT agree with Ms. Scuderi as to whether the services billed by ITA are attributable to telephone number (904) 479-4515? If not, is there a history of such calls on the subscriber's previous three bills?
3. Please describe SBT's experience with ITA with respect to disputed bills and customer complaints. Is SBT satisfied with the validity of ITA's billings?
4. Please credit or rebate Ms. Scuderi's account for the disputed charges or explain why not.

- A8 -

Scuderi, Diane

Tms #3

Ms. Nancy Sims
July 12, 1995
Page 2

5. The enclosed generic pay per call addendum was provided in response to item 3(a) of Staff's first set of interrogatories in Docket 941000-T1. In its response Southern Bell stated a clearinghouse or IXC must sign such an agreement in order to bill pay per call charges through Southern Bell. Has ITA signed such an agreement? If so, please explain whether ITA is in compliance with the agreement. The Commission staff has received numerous complaints from customers who have disputed ITA charges appearing on their Southern Bell bill. Based upon these complaints, it appears that Southern Bell would have ample evidence to terminate its billing and collection contract with ITA under the agreement.

6. Based on the review of this matter, please state whether, in this instance, ITA has complied with all applicable tariff and/or contract requirements related to the bill in question. If complaints of bogus billing by ITA are expected to continue, does SBT believe it is compelled to bill for ITA? If so, please cite applicable laws and/or requirements.

7. Please provide any other information pertinent to this inquiry.

Meanwhile, feel free to contact me if you have any questions.

Sincerely,



 J. Alan Taylor, Chief
Bureau of Service Evaluation

Enclosures

c: Kathy Lewis
Monica Barone

July 5, 1995

Mr. Alan Taylor
Division of Communication
2540 Sumard Oak Blvd.
Tallahassee, FL 32399



RE: ITA (International Telemedia Services)

Dear Mr. Taylor:

I am writing in regard to two services charges assessed to me on my last telephone bill. These charges were billed to me by an unregulated communication company, ITA. ITA's charges were for \$30 each and dated May 7 (for Teleservices) and June 7, 1995 (for Voicemail). Just for the record, May 7 was a Sunday which is a day ITA is closed so I could not have ordered their service then and on June 7, I was honeymooning in Las Vegas, therefore had no direct contact to my home phone.

After reviewing my phone bill I tried to call ITA regarding these charges. The 800 number that was given on the bottom of the billing statement was no in proper working order when I called it. I had to dial 7 times before I was actually accepted by their system (after their system made the greeting announcement the connection would be cut off, giving the caller a dial signal). When I finally was connected, I explained my situation to a woman. I asked her what the charges were for and she said an entertainment line. I told her that neither my husband or I would have ordered such a services. She said and I quote, "We show that this services was directly ordered from your phone line so we can't do anything". She then went on to give me another number to call 800-997-9943 to cancel the service. When I asked for a supervisor, she refused and cut me off the line.

I then called the number stated above only to reach a message. The first time I called I apparently pressed the wrong button so I called back and canceled the service.

I then tried another half a dozen times to call the original 800-866-8889 number back. This time I spoke to a man named Vincent. I asked him immediately if I could speak to a supervisor. His supervisor, Damion, got on line shortly after.

I explained my problem to him. He then told me that I was wrong because someone had dialed directly from my phone line to order this service. After correcting him I demanded that the charges be taken off my bill because the service was never ordered! I then proceeded to tell him that I wanted proof of the order and a list of itemized times the service was used from my line. He told me he would connect me with someone who is willing to speak with me, then rudely put me on hold.

After 5 minutes on hold, Shanell got on line and explained to me she couldn't help me with my problem because she was working for a company that was only a service company for ITA. She further stated in order for these charges to be taken off my bill I would have to write to:

Absolute Communication
208 East 51st Street
Suite 360
New York, NY 10022

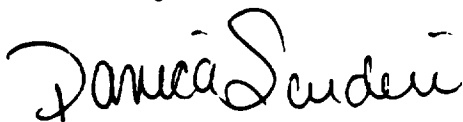
She stated the company will respond to me within 45 days to tell me whether or not they are going to drop the charges.

I have called Southern Bell to notify them of this problem. They have sent a notification to ITA telling them I was not paying that portion of my bill.

These entertainment services should get written confirmation from the household being billed. I just can't believe that this company has put charges on my bill when they had no right to do so.

I hope this letter will assist in the endless battles to end dishonesty with unregulated companies such as ITA. I look forward to your reply.

Sincerely,



Danica P. Scuderi

Enclosure: cc of ITA's billing statement

TMS #3



Southern Bell

Nancy H. Sims
Director - Regulatory Relations

Suite 400
150 S. Monroe Street
Tallahassee, Florida 32301
904 222-1201
FAX 904 222-8640

August 14, 1995

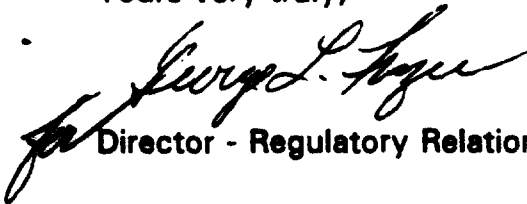
**Mr. Alan Taylor, Chief
Bureau of Service Evaluation
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald L. Gunter Building, Room 270
Tallahassee, Florida 32399-0850**

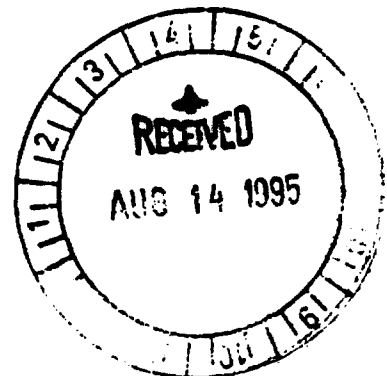
Dear Mr. Taylor:

Attached is Southern Bell's response to Staff's request concerning the ITA.

If you have any further questions, please do not hesitate to call.

Yours very truly,


for Director - Regulatory Relations



- A12 -

A BELL SOUTH Company

Southern Bell Tel. & Tel. Co.
Pay Per Call Billing - ITA
July 31, 1995
Item No. 1

REQUEST: Describe the services provided by SBT to ITA and provide a reference whether from interstate or intrastate tariffs.

RESPONSE: SBT provides Bill Processing without Inquiry to ITA. Intrastate service is provided under Section E8.2 of the Access Service Tariff and interstate service is provided under contract.

Southern Bell Tel. & Tel. Co.
Pay Per Call Billing - ITA
July 31, 1995
Item No. 2

- REQUEST:**
- (a) Can SBT from SMDR or other records verify that the toll or 800 number calls in question were or were not made or received by the subscriber's number?
 - (b) If so, does SBT agree with Ms. Scuderi as to whether the services billed by ITA are attributable to telephone number (904) 479-4515?
 - (c) If not, is there a history of such calls on the subscriber's previous three bills?

- RESPONSE:**
- (a) No. SBT does not perform this type of Recording function for ITA's services.
 - (b) Not applicable.
 - (c) No ITA toll charges were billed to this account on the previous three bills (March, April, and May 1995).

Southern Bell Tel. & Tel. Co.
Pay Per Call Billing - ITA
July 31, 1995
Item No. 3

REQUEST: (a) Please describe SBT's experience with ITA with respect to disputed bills and customer complaints.

(b) Is SBT satisfied with the validity of ITA's billings?

RESPONSE: (a) The rate of inquiries from end users is substantially higher than SBT normally experiences with IXC's which purchase Bill Processing without Inquiry.

(b) Based on the number of complaints from end users related to billing from ITA, SBT is concerned that there may be problems with ITA's billing and inquiry processes.